

REMARKS

In the Office Action mailed April 26, 2006, the Examiner noted that claims 1-23 were pending and rejected claims 1-23. Claims 1, 7, 13-14, 18 and 20 have been amended, and, thus, in view of the forgoing claims 1-23 remain pending for reconsideration which is requested. No new matter has been added. The Examiner's rejections are traversed below.

In the Office Action the Examiner rejected claims 1-8, 13-20 and 23 under 35 U.S.C. section 112 paragraph 2 as indefinite. Claims 1, 7, 13, 14, 18 and 20 have been amended in consideration of the Examiner's comments and it is submitted they satisfy the requirements of the statute. The rejection of claim 23 is not understood as the pairing of phrases of concern to the Examiner does not appear in claim 23. If additional concerns with the claims arise, the Examiner is invited to telephone to resolve the same. Suggestions by the Examiner are also welcome. Withdrawal of the rejection is requested.

Page 3 of the Office Action rejects all claims under 35 U.S.C. § 103 over Manchester and Kim.

Manchester discusses a system that reorients the entire display (portrait/landscape) and does not teach or suggest a display of multiple parts. Manchester teaches rotating the whole display or the display "moves" between positions.

Kim discusses a multiple part display (TV with picture-in-picture PIP) where all the parts are a fixed position relative to the display and where the PIP is superimposed or covers part of the main image. In particular the PIP, which can be based on a display signal that has a different orientation, is reoriented to match the main display orientation. Kim teaches a PIP image which essentially is locked to the orientation of the main display (Kim reorients the PIP to always match the main display, which is either rotated to a correct orientation by the system supplying the signal or rotated to the correct orientation by Kim's circuitry). In Kim the reoriented image is coming from an unrelated variable orientation source. In particular, Kim notes:

It is an object of the present invention to provide pivot apparatus and method of a video display device having a PIP function, capable of showing PIP displays in the same orientation (direction) as the main display.
(See Kim, col. 1, lines 64-66, underlining emphasis supplied)

The Examiner asserts that the combination of Kim and Manchester makes the invention of claim 1 obvious. In particular the Examiner, on page 5 of the action discusses combining the "circuits" of the two references. The Examiner appears to interpreting the combination as

suggesting one image fixed to the display orientation and one image can be reoriented relative to the display.

This is not correct, rather than allowing one part to essentially move while the other part is fixed to the display orientation the combination would allow the main image to move and the secondary image (or PIP) would be locked to the main image no matter what the orientation of the main image or of the variably oriented secondary image signal. That is, one image moves and the other image is locked to the moving image.

Manchester teaches rotating the whole display, that is, the main display moves, so combining with Kim would result in a PIP image which rotates to the same relative orientation as a moving main display. That is, as stated by Kim, the PIP image would have "the same orientation (direction) as the main display" or moving image. This combination is not a system of the invention where there is a different independent orientation for different parts of the display GUI:

1. A graphical user interface displayed on a display and comprising a first part and a second part, the method comprising: the first part element is automatically reoriented relative to the display in accordance with a change to orientation/location information; and allowing the second interface part to remain in a same orientation relative to the display regardless of the change to the orientation/location information.

Further, one of skill in the art would not seek to combine the teachings of the references. First, because Manchester says and suggests nothing about a two part display. Second, because the combination, according to the Examiners interpretation, would destroy the purpose or object of Kim noted above. Third, because a part of the one of the images would be obscured contrary to the object of allowing users to work on the same image object as shown in application figure 6. Fourth, Kim is dealing with two external image sources while Manchester deals with a single internal image source so the combination of the two would require the duplication of a source. Fifth, the two external source model of Kim and the single internal source of Manchester does not suggest the idea of separating the internal image source (the GUI) into parts so as to rotate different parts of the GUI differently as in the invention of claim 1.

The Examiner has, on pages 6 and 7, apparently interpreted independent claims 7, 13 and 18-23 as equivalent to claim 1 and lumped these independent claims 7, 13 and 18-23 in with claim 1 as obvious without further comment about these claims.

Even though these independent claims 7, 13 and 18 -23 are different than claim 1, even with the Examiners unwarranted interpretation, these claims further distinguish over the prior

art. For example, claim 18 calls for "not responding to the changing of the use orientation". Nothing in the prior art teaches or suggests this. As acknowledged by the Examiner on page 5 of the Action, in Manchester that orientation is automatic which teaches away from such not responding to the orientation change (see also "automatically", Manchester, Abstract, line 6).

It is submitted that the independent claims distinguish over the prior art and withdrawal of the rejection is requested.

The dependent claims depend from the above-discussed independent claims and are patentable over the prior art for the reasons discussed above. The dependent claims also recite additional features not taught or suggested by the prior art. For example, claim 12, dependent on claim 10, emphasizes the "orienting further comprises orienting user input relative to the element" where an element of the interface is automatically oriented to the user (claim 10). See the interface element 22 of figures 1 and 2. The prior art does not teach or suggest such input reorientation. It is submitted that the dependent claims are independently patentable over the prior art.

It is submitted that the claims satisfy the requirements of 35 U.S.C. 112. It is further submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

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